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**Allman & Nielsen, P.C.**  
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 Telephone: 415.461.2700  
 Facsimile: 415.461.2726

Attorneys for Defendant  
 ROCKRIDGE MANOR HOMEOWNERS' ASSOCIATION  
 AND SPECIALLY APPEARING DEFENDANTS  
 CHARLES BLAKENEY AND PURPORTED ENTITIES  
 ROCKRIDGE MANOR CONDOMINIUM AND  
 ROCKRIDGE MANOR BOARD OF DIRECTORS

IN THE UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE CHANG, individually and as Guardian ad  
 Litem for ERIC SUN, disabled

Plaintiffs,

v.

ROCKRIDGE MANOR CONDOMINIUM, ROCKRIDGE  
 MANOR HOMEOWNERS' ASSOCIATION;  
 ROCKRIDGE MANOR BOARD OF DIRECTORS;  
 ROCKRIDGE MANOR PRESIDENT OF BOARD OF  
 DIRECTORS CHARLES BLAKENEY; ROCKRIDGE  
 MANOR MANAGER EVA AMMANN; TRUCK  
 INSURANCE EXCHANGE; AND DOES 1-30, inclusive,

JOINDER

UNIVERSITY OF CALIFORNIA BERKELEY; UC  
 BERKELEY CHANCELLOR ROBERT BIRGENEAU; UC  
 BERKELEY PUBLIC RECORDS COORDINATOR  
 ALAN KOLLING; UC BERKELEY GENERAL  
 COUNSEL SUSAN VON SEEBURG; UC BERKELEY  
 POLICE DEPARTMENT CHIEF VICTORIA  
 HARRISON; UC BERKELEY POLICE DEPARTMENT  
 LIEUTENANT ADAN THJADA; UC BERKELEY  
 POLICE DEPARTMENT MANAGER TOM KLATT; UC  
 BERKELEY POLICE DEPARTMENT DISPATCHER  
 CONSTANCE PEPPERS CELAYA; and DOES 31-60,  
 inclusive,

JOINDER

PAMELA ZIMBA, ATTORNEY AT LAW; ALBERT  
 COOMBES, ATTORNEY AT LAW; and DOES 61-90,  
 inclusive,

Defendants

Case No.: C07-4005 EMC

**DECLARATION OF SCOTT  
 HALBROOK IN SUPPORT OF  
 DEFENDANTS ROCKRIDGE  
 MANOR HOMEOWNERS'  
 ASSOCIATION, CHARLES  
 BLAKENEY, ROCKRIDGE MANOR  
 CONDOMINIUM AND ROCKRIDGE  
 MANOR BOARD OF DIRECTORS'  
 MOTION FOR RELIEF FROM  
 DEFAULT AND FOR LEAVE TO  
 FILE MOTION TO DISMISS AND  
 MOTION FOR SUMMARY  
 JUDGMENT**

Date:

Time: .

Room: C

Judge: Magistrate Judge Edward M. Chen

**DECLARATION OF SCOTT HALBROOK IN SUPPORT OF  
 DEFENDANTS ROCKRIDGE MANOR HOMEOWNERS'  
 ASSOCIATION, CHARLES BLAKENEY, ROCKRIDGE MANOR  
 CONDOMINIUM AND ROCKRIDGE MANOR BOARD OF  
 DIRECTORS' MOTION FOR RELIEF FROM DEFAULT AND  
 FOR LEAVE TO FILE MOTION TO DISMISS AND MOTION  
 FOR SUMMARY JUDGMENT**

**ALLMAN & NIELSEN, P.C.**  
 100 Larkspur Landing Circle, Suite 212  
 Larkspur, CA 94939  
 Telephone: 415.461.2700 Facsimile: 415.461.2726

1 I, Scott Halbrook, do declare as follows:

2 I am employed as an insurance agent, operating an insurance business known as Halbrook  
3 Insurance Agency, located at 1425 Leimert Boulevard, Suite 100, Oakland, California 94602. The  
4 great majority of the insurance that I sell is insurance placed with Farmers Insurance and an  
5 affiliated company, Truck Insurance Exchange. I am an insurance agent who sells insurance  
6 products. I do not have training as a claims representative. I have never worked as a claims  
7 representative. I do not have a working knowledge of claims handling procedures.

8 On or about August 1, 2007 I started handling the insurance account for Rockridge Manor  
9 Homeowners' Association. Prior to that time, the Association's insurance agent was Norman  
10 Young, who had recently retired. I made an appointment to meet with the Rockridge Manor  
11 Homeowners' Association Board of Directors at its September 19, 2007 meeting.

12 Before my meeting with the Board of Directors, sometime in the early part of September,  
13 2007, I had one or more conversations with the Association's manager, Adelio Zunino. Mr. Zunino  
14 told me that he had received copies of the summons and complaint in this action. I believed from  
15 my conversations with Mr. Zunino that the matter was being handled by an attorney for the  
16 Association and Farmers Insurance. I therefore did not inform Farmers Insurance that the summons  
17 and complaint had been received by the Association's manager.

18 At about that same time, I also had received a copy of the summons and complaint, which  
19 had been brought to me by a person whose office was close to retired Farmers agent Norman  
20 Young's office. I assumed that this copy of the summons and complaint, addressed to Norman  
21 Young, was an informational copy. I did not think that the delivery of the summons and complaint  
22 to Mr. Young's old address was an effort to serve Farmers Insurance or Truck Insurance Exchange.  
23 I therefore did not forward the summons and complaint to Farmers' claims department.

24 At the September 19, 2007 meeting with the Association's Board of Directors, there was a  
25 discussion about this new case, as well as the previous state court action which had been defended  
26 by the Allman & Neilsen law office. My assumption during this conversation, which I believe was  
27 shared by all present, was that the case was in the process of being defended by attorneys appointed  
28 to represent the Association.

29 On October 9 2007, while I was in Southern California, I was informed by the customer  
30 service representative in my office, Kenisha Talton, that she had just received plaintiffs' "motion

31 **DECLARATION OF SCOTT HALBROOK IN SUPPORT OF**  
32 **DEFENDANTS ROCKRIDGE MANOR HOMEOWNERS'**  
**ASSOCIATION, CHARLES BLAKENEY, ROCKRIDGE MANOR**  
**CONDOMINIUM AND ROCKRIDGE MANOR BOARD OF**  
**DIRECTORS' MOTION FOR RELIEF FROM DEFAULT AND**  
**FOR LEAVE TO FILE MOTION TO DISMISS AND MOTION**  
**FOR SUMMARY JUDGMENT**

ALLMAN & NEILSEN  
100 Lakeside Landing Circle, Suite 212  
Larkspur, CA 94939  
Telephone: 415-461-7980 Facsimile: 415-461-2726

1 for default judgment." That day I also received word from Charles Blakeney, a member of the  
 2 Association's Board of Directors, informing me that the Association and Mr. Blakeney had received  
 3 copies of the plaintiffs' motion for default judgment. Ms. Talton of my office forwarded plaintiffs'  
 4 motion to the Farmers claims department that day or the following day.

5 I declare under penalty of perjury under the laws of the state of California that the foregoing  
 6 is true and correct and that this declaration was executed on November 1, 2007 in Oakland,  
 7 California.

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 12 SCOTT HALBROOK

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 31 **DECLARATION OF SCOTT HALBROOK IN SUPPORT OF**  
 32 **DEFENDANTS ROCKRIDGE MANOR HOMEOWNERS'**  
**ASSOCIATION, CHARLES BLAKENY, ROCKRIDGE MANOR**  
**CONDOMINIUM AND ROCKRIDGE MANOR BOARD OF**  
**DIRECTORS' MOTION FOR RELIEF FROM DEFAULT AND**  
**FOR LEAVE TO FILE MOTION TO DISMISS AND MOTION**  
**FOR SUMMARY JUDGMENT**

31 415-461-2700  
 32 100 Lakeside Landing, Suite 201  
 Lakeside, CA 94035  
 Telephone: 415-461-2700 Fax: 415-461-2726

**PROOF OF SERVICE**

I am a citizen of the United States and employed in Marin County, California. I am over the age of eighteen years and not a party to the within action. My business address is 100 Larkspur Landing Circle, Suite 212, Larkspur, California 94939-1743.

On this date I served the foregoing documents described as:

**DECLARATION OF SCOTT HALBROOK IN SUPPORT OF DEFENDANTS  
ROCKRIDGE MANOR HOMEOWNERS' ASSOCIATION, CHARLES BLAKENEY,  
ROCKRIDGE MANOR CONDOMINIUM AND ROCKRIDGE MANOR BOARD OF  
DIRECTORS' MOTION FOR RELIEF FROM DEFAULT AND IN OPPOSITION TO  
MOTION FOR DEFAULT JUDGMENT AND LEAVE TO FILE MOTION TO DISMISS  
AND MOTION FOR SUMMARY JUDGMENT**

on the interested parties in the action by placing [ ] the original [x] a true copy thereof, enclosed in a sealed envelope addressed as follows:

Christine Chang  
341 Tideway Drive #214  
Alameda, CA 94501  
Telephone (510) 769-8232

Pro Se, individually and as Guardian ad Litem  
for ERIC SUN, disabled

Gaylyn Kim Conant  
LOMBARDI, LOPER & CONANT, LLP  
Lake Meritt Plaza  
1999 Harrison Street, Suite 2600  
Oakland, CA 94612  
Telephone: (510) 433-2600  
Facsimile: (510) 433-2699

Attorney for Defendants  
THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA, ROBERT BIRGENEAU,  
CONSTANCE PEPPERS CELAYA, ADAN  
TEJADA, VICTORIA HARRISON, ALLAN  
KOLLING, TOM KLATT AND SUSAN VON  
SEEBURG

Lee J. Danforth  
Coddington Hicks & Danforth  
555 Twin Dolphin Drive Suite 300  
Redwood City CA 94065  
Telephone: (650) 592-5400

[ ] **BY MAIL:** I deposited such envelope with postage thereon fully prepaid in the mailbox regularly maintained by the delivery service carrier at Larkspur, California.

[ ] **BY PERSONAL SERVICE:** I delivered such envelope by hand to the addressee.

[ ] **BY FACSIMILE:** I sent such document via facsimile to the facsimile machine of the addressee.

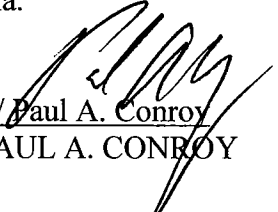
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2 [x] **BY E-MAIL:** I transmitted a true electronic copy of the foregoing documents by e-mail to  
3 Christine Chang's e-mail address: Christie1chang@peoplepc.com, Gaylyn Kirn Conant's  
4 email address: gkc@llcllp.com, and Lee Danforth's email address:  
LDanforth@CHDLAWYERS.com

5 I declare under penalty of perjury under the laws of the State of California that the foregoing  
6 is true and correct to the best of my knowledge.

7 Executed on November 2, 2007, at Larkspur, California.

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10 /s/ Paul A. Conroy  
11 PAUL A. CONROY  
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